

1 PAOLA M. ARMENI, ESQ.
Nevada Bar No. 8357
2 Email: parmeni@clarkhill.com
CLARK HILL PLLC
3 1700 S. Pavilion Center Drive, Suite #500
Las Vegas, Nevada 89135
4 Tel: (702) 862-8300
Fax: (702) 778-9709
5 *Attorneys for Plaintiffs*

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 MICHAEL LEWIS, Individually and as
Administrator of the Estate of Kevin Lewis,
9 Deceased, MICHAEL LEWIS as Guardian Ad
Litem of L.A.L, a minor, and E.L.L., a minor, as
10 heirs of the Estate of KEVIN LEWIS, Deceased,

11 Plaintiff

12 vs.

13 CITY OF HENDERSON, NEVADA, a political
subdivision of the State of Nevada;
14 HENDERSON POLICE DEPARTMENT, a
political subdivision of the State of Nevada;
15 THEDRICK ANDRES, individually and as policy
maker and Chief of CITY OF HENDERSON
16 POLICE DEPARTMENT; DOE HENDERSON
POLICE OFFICERS I through X; LAS VEGAS
17 METROPOLITAN POLICE DEPARTMENT, a
political subdivision of the State of Nevada;
18 SHERIFF JOE LOMBARDO, individually and as
policy maker of LAS VEGAS METROPOLITAN
19 POLICE DEPARTMENT; DOE LAS VEGAS
METROPOLITAN POLICE DEPARTMENT
20 OFFICERS, I through X; DOES I through X; and
ROE ENTITIES, I through X, inclusive,

21 Defendants

CASE NO. 2:21-cv-01128-CDS-DJA

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
STIPULATED DISMISSAL
(5th Request)**

22 IT IS HEREBY STIPULATED by and between Plaintiff Michael Lewis, Individually, as
23 Administrator of the Estate of Kevin Lewis, Deceased, and as Guardian Ad Litem of L.A.L, a
24 minor, and E.L.L., a minor, as heirs of the Estate of Kevin Lewis, Deceased, by and through their
25 counsel Paola M. Armeni, Esq., of the law firm Clark Hill, PLLC, and Defendants City of
26 Henderson, Henderson Police Department, and Chief Thedrick Andres, by and through their
27 counsel, Robert W. Freeman, Jr. Esq., of the law firm Lewis Brisbois Bisgaard & Smith, LLP, that
28 the deadline to file the Stipulated Dismissal currently due September 26, 2024, be continued for

an additional thirty-two (32) days, up to and including October 28, 2024.

The Order Granting the Minors' Compromise was filed on July 22, 2024; however, the parties require additional time to file the stipulated dismissal due to the Defendant, City of Henderson, requiring a Conditional Payment Letter from Medicare for the deceased, Kevin Lewis, prior to issuing the settlement checks to the Plaintiff. As of September 26, 2024, Plaintiffs' counsel has not received a Conditional Payment Letter from Medicare.

This request for extension is made in good faith and not for the purposes of delay.

APPROVED AS TO FORM AND CONTENT.

Respectfully submitted this 26th day of September 2024.

CLARK HILL, PLLC

/s/ Paola M. Armeni, Esq.

PAOLA M. ARMENI

Nevada Bar No. 8327

1700 S. Pavilion Center Dr. Ste. 500

Las Vegas, Nevada 89135

GERALD I. GILLOCK & ASSOCIATES

GERALD I. GILLOCK

Nevada Bar No. 51

MICHAEL H. COGGESHALL

Nevada Bar No. 14502

428 South Fourth Street

Las Vegas, Nevada 89101

TIMOTHY R. O'REILLY, CHTD.

TIMOTHY R. O'REILLY

Nevada Bar No. 8866

TRACIE M. JEFCK

Nevada Bar No. 15575

325 S. Maryland Parkway

Las Vegas, Nevada 89101

Attorneys for Plaintiffs

LEWIS BRIOSBOIS BISGAARD & SMITH
LLP

/s/ Robert W. Freeman, Esq.

ROBERT W. FREEMAN

Nevada Bar No. 3062

E. MATTHEW FREEMAN

Nevada Bar No. 14198

6385 S. Rainbow Blvd., Suite 600

Las Vegas, Nevada 89118

Attorneys for Defendants City of Henderson,

Nevada; Henderson Police Department; and

Chief Thedrick Andres

Based on the parties' stipulation, the deadline to file a stipulation of dismissal is extended, nunc pro tunc, to October 28, 2024.


U.S. DISTRICT JUDGE

Dated: October 1, 2024